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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

DEC 20 2005

Federal Communications Commission  
Office of Secretary

In the Matter of

Amendment of Section 73.202(b) )  
Table of Allotments ) MB Docket No. 05-282  
FM Broadcast Stations ) RM - 11229  
(Rockmart and Aragon, Georgia, and )  
Lynchburg and Chattanooga, Tennessee) )  
)

To: Office of the Secretary  
Attn: Assistant Chief, Audio Division  
Media Bureau

**JOINT REPLY COMMENTS**

J. L. Brewer Broadcasting of Cleveland, LLC, and J. L. Brewer Broadcasting, LLC, (together, "Brewer"), and Woman's World Broadcasting, Inc. ("WWB"), by their respective counsel, hereby submit their Joint Reply Comments in the above referenced docket. Brewer and WWB filed separate proposals in this proceeding that are in technical conflict under the Commission's Rules. Specifically, Brewer's proposal to allot Channel 230C3 to Decatur, Tennessee, conflicts with WWB's proposal to allot Channel 230A to Lynchburg, Tennessee. However, pursuant to a settlement agreement between Brewer and WWB,<sup>1</sup> Brewer has agreed to amend its proposal as specified herein to eliminate the conflict with WWB's proposed allotment of Channel 230A to Lynchburg.<sup>2</sup>

1. In its Counterproposal Brewer proposed to, *inter alia*, delete Channel 230C3 at Spring City, Tennessee, allot Channel 230C3 to Decatur, Tennessee as that community's first local service, and modify the license for Station WAYA(FM) accordingly. This proposal

<sup>1</sup> Affidavits pursuant to Section 1.420(j) of the Commission's Rules are attached hereto regarding Brewer's amendment. See Exhibit 1.

<sup>2</sup> The amendment proposed herein also eliminates the conflict between Brewer's counterproposal and a counterproposal filed by Bart Walker.

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conflicts with WWB's proposal to allot Channel 230A to Lynchburg. However, Brewer has located an alternative site for Channel 230C3 at Decatur at the coordinates of 35-27-30 North Latitude, 84-42-18 West Longitude, and Brewer desires to amend its Counterproposal to specify this site. This site does not conflict with WWB's proposal to allot Channel 230A to Lynchburg.

2. As demonstrated in the attached Technical Report, Channel 230C3 can be allotted to Decatur at the coordinates of 35-27-30 North Latitude, 84-42-18 West Longitude consistent with Section 73.207 the Commission's Rules with respect to all existing and proposed allotments and facilities provided that the same changes are made at Ringgold and Ellijay, Georgia,<sup>2</sup> and Anderson, South Carolina as proposed in Brewer's Counterproposal. *See* Technical Report. A 70 dBu signal can be provided to Decatur from the proposed new reference coordinates. *See* Exhibit E1B. These new reference coordinates for relocation of WAYA(FM) from Spring City to Decatur will result in a predicted net gain in population of 31,016 persons within the proposed WAYA(FM) 60 dBu contour. *See* Exhibit E1D. The loss area will continue to receive at least 5 other aural services and will thus remain well served. *See* Exhibit E1E. If its amended Counterproposal is granted, Brewer will file applications for Channel 230C3 at Decatur and Channel 228A at Harrison and construct the facilities as authorized.

3. Brewer also hereby withdraws its allegation, in paragraph 1 of its Counterproposal, that WWB's proposal for Channel 296C1 at Aragon, Georgia violates Section 73.315 of the Commission's Rules. Other than these changes Brewer's Counterproposal remains the same.<sup>3</sup>

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<sup>2</sup> As demonstrated in the attached Technical Report, Brewer's proposed substitution of Channel 266A for Channel 228A for Station WLJA-FM, Ellijay, Georgia, eliminates pre-existing short spacings to Stations WMPZ(FM), Ringgold, Georgia and WKZX-FM, Lenoir City, Tennessee.

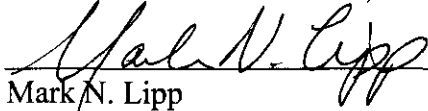
<sup>3</sup> The Technical Report attached hereto is the complete technical proposal for the amended Brewer Counterproposal and should replace the technical report that was submitted as part of the Brewer Counterproposal as originally filed.

WHEREFORE, because WWB's Rule Making and Brewer's Counterproposal, as amended, both serve the public interest by collectively providing for first local services to three communities with a combined population 10,064, Brewer and WWB request that the Commission accept Brewer's amended Counterproposal.

Respectfully submitted,


J. L. BREWER BROADCASTING OF  
CLEVELAND, LLC

J. L. BREWER BROADCASTING, LLC

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Its Counsel

December 20, 2005

**TECHNICAL REPORT  
IN SUPPORT OF A MODIFICATION  
TO A COUNTERPROPOSAL  
AND COMMENTS  
MB DOCKET NO. 05-282**

This technical report was developed in support of a modification to a counterproposal and comments filed in response to MB Docket No. 05-282. The proposal seeks a change in community of license for station WAYA on 230C3 at Spring City, TN to 230C3 at Decatur, TN. In order to accommodate this change, a change in channel and city of license for station WMPZ on 229A at Ringgold, GA to 228A at Harrison, TN are proposed as well as a substitution of channel 266A for station WLJA-FM's 228A at Ellijay, GA at its currently licensed site and a declass of station WROQ on 266C0 to 266C1 at its licensed site. This modification removes the conflict with the proposed Lynchburg, TN 230A substitution proposed in MB Docket No. 05-282.

**Summary of Proposed Changes**

<b>Community</b>	<b>Affected Station</b>	<b>Present</b>	<b>Proposed</b>
<b>Spring City, TN</b>	<b>WAYA</b>	<b>230C3</b>	<b>-----</b>
<b>Decatur, TN</b>	<b>WAYA</b>	<b>-----</b>	<b>230C3</b>
<b>Ringgold, GA</b>	<b>WMPZ</b>	<b>229A, 270A</b>	<b>270A</b>
<b>Harrison, TN</b>	<b>WMPZ</b>	<b>-----</b>	<b>228A</b>
<b>Ellijay, GA</b>	<b>WLJA-FM</b>	<b>228A</b>	<b>266A</b>
<b>Anderson, SC</b>	<b>WROQ</b>	<b>266C0, 297C</b>	<b>266C1, 297C</b>

**A. Reallocation of WAYA to Decatur, TN on 230C3 as a First Aural Service:**

The reallocation of WAYA on 230C3 from Spring City to Decatur, TN (1,395) as a first local service is proposed at coordinates **N 35-27-30 W 84-42-18.**

Spring City will continue to receive service from station WXQK on 970 kHz operating with .5 kW daytime and .024 kW at night.

A channel study is included as Exhibit E1A. In order to eliminate the short-spacing to WMPZ on 229A, the substitution of channel 228A for WMPZ's 229A and its reallocation to Harrison, TN are proposed herein. The proposed WAYA 230C3 allocation at Decatur, TN is clearly mutually exclusive with the licensed WAYA 230C3 facility.

Exhibit E1B demonstrates the proposed 230C3 allocation's uniform 23.2 km 70 dBu contour encompasses the entire community of Decatur, and E1C shows that line of sight may be obtained from the proposed allocation point to the Decatur reference point.

**WAYA Gain-Loss:**

The proposed WAYA Decatur, TN 230C3 allocation will serve a population of 202,787 and an area of 4,803 sq km. This represents a population gain of 49,133 in an area of 659 sq km. The loss area includes a population of 18,117 in an area of 659 sq km yielding a net population gain of 31,016 (+18%). The data was determined using uniform 39.1 km 60 dBu contours for the existing and proposed facilities. The gain and loss areas are plotted on Exhibit E1D, and Exhibit E1E demonstrates that the gain and loss areas receive at least five (5) fulltime FM services. This study is based on uniform, maximum 60 dBu radii for all Class A, C3, C2 and C1 commercial FM stations, calculated uniform radii for the actual ERP and HAAT for Class C0 and C stations and actual 60 dBu predicted contours for noncommercial stations.

Exhibit E1F demonstrates that the proposed WAYA uniform 70 dBu contour will not encompass any of the Cleveland, TN Urbanized Area.

**B. Reallocation of WMPZ on 228A to Harrison, TN as a First Aural Service:**

The substitution of channel 228A for 229A for station WMPZ is required to accommodate the proposed Decatur 230C3 allocation. It is also proposed to reallocate WMPZ from Ringgold, GA to Harrison, TN (7,630) on 228A as a first local aural service at coordinates **N 35-07-06 W 85-14-29.**

Ringgold, GA will continue to receive service from station WTUN on channel 270A.

A channel study is included as Exhibit E2A. It is noted that a substitution of channel 266A for WLJA-FM's 228A at Ellijay, GA and the declass of station WROQ from 266C0 to 266C1 are required for the implementation of this proposal. It is noted that WHRP on 227C1 at Tullahoma, TN was deleted as a final Report and Order in MB Docket No. 03-244. It is also evident from the channel study that the proposed WMPZ 228A allocation at Harrison, TN is mutually exclusive with the licensed WMPZ 229A facility.

Exhibit E2B demonstrates the proposed 228A uniform maximum class A (16.2 km) 70 dBu contour encompasses the entire community of Harrison, TN, and Exhibit E2C shows that line of sight may be obtained from the proposed allocation point to the Harrison reference point

**WMPZ Gain-Loss:**

The proposed WMPZ Harrison, TN 228A allocation will serve a population of 399,987 and an area of 2,516 sq km. This represents a population gain of 92,989 in an area of 1,393.8 sq km. The loss area includes a population of 109,246 in an area of

1393.8 sq km yielding a net population loss of 16,257. The data was determined using uniform 28.3 km 60 dBu contours for the existing and proposed facility.

The gain and loss areas are plotted on Exhibit E2D, and Exhibit E2E demonstrates that the gain and loss areas receive at least seven (7) fulltime FM services. A number of stations were omitted for clarity. This study is based on uniform, maximum 60 dBu radii for all Class A, C3, C2 and C1 commercial FM stations, calculated uniform radii for the actual ERP and HAAT for Class C0 and C stations and actual 60 dBu predicted contours for noncommercial stations.

Exhibit E2F demonstrates that the proposed WMPZ 228A uniform 70 dBu contour will encompass 68.5% of the Chattanooga, TN- GA Urbanized Area.

**C. WLJA-FM 266A Substitution:**

The substitution of channel 266A for 228A at the licensed site of station WLJA-FM at Ellijay, GA is required to clear the proposed WMPZ 228A substitution. A channel study is included as Exhibit E3 demonstrating that channel 266A meets all Commission spacing requirements when station WROQ on 266C0 is declassified to 266C1. No 70 dBu or line of sight exhibits are included since the station's licensed site is utilized. It is also noted that the existing WLJA-FM facility is short-spaced to WMPZ on 229A (8.6 km) and to WKZX-FM at Lenoir, TN on 228A (.58 km). The 266A substitution and WMPZ move will provide the additional allocation benefit of eliminating both short-spacings.


**D. WROQ 266C1 Declass:**

The declass of WROQ at its licensed site from 266C0 to 266C1 is proposed herein with the licensee's consent. WROQ is a grandfathered short-spaced station, and the proposed declass will decrease existing short-spacing to WSSL-FM (79.24 km to

77.24 km), WWDM (59.59 km to 48.58 km) and eliminates a 1.15 km short-spacing to WPZS. A channel study is included as Exhibit E4A. Exhibit E4B demonstrates 70 dBu coverage of Anderson, SC and E4C demonstrates line of sight to that community. It is noted that only a two (2) meter reduction in HAAT is required to implement the downgrade.

**Summary and Conclusion:**

This proposal will result in two new first local aural services to Decatur, TN (1,395) and Harrison, TN (7,630). There is a net population gain of 14,759 resulting from the proposal as a whole. The gain and loss areas will continue to be well served with five or more fulltime aural services, and three shorts-spacings will be eliminated and two others reduced by the changes proposed herein. It is concluded that the proposed changes comply with Commission allocations rules and policies.

  
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# E1A DECATUR 230C3 CHANNEL CTUDY

## REFERENCE

35 27 30 N.

84 42 18 W.

CLASS = C3

Current Spacings

## DISPLAY DATES

DATA 12-17-05

SEARCH 12-19-05

----- Channel 230 - 93.9 MHz -----

Call	Channel	Location		Azi	Dist	FCC	Margin
WAYA	LIC-N 230C3	Spring City	TN	352.0	8.09	153.0	-144.91 (1)

(1) Note mutual exclusivity with licensed WAYA facility.

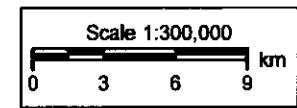
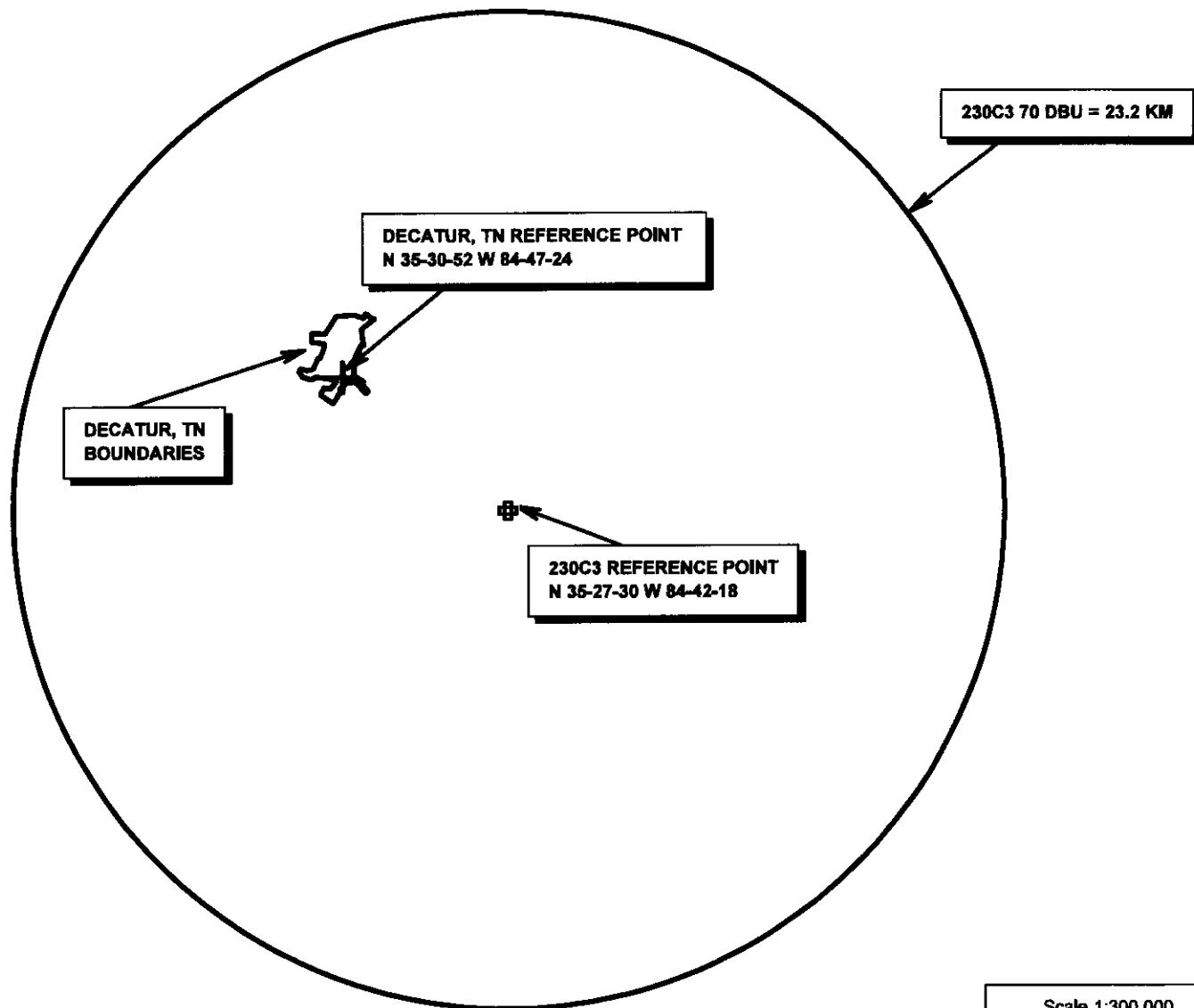
WMPZ	LIC-N 229A	Ringgold	GA	214.3	75.48	89.0	-13.52 (2)
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(2) Substitution of 228A proposed herein.

RADD	ADD	230A	Wartrace	TN	268.8	143.31	142.0	1.31
RADD	ADD	230A	Lynchburg	TN	266.4	144.17	142.0	2.17
WBXE	LIC-N	229C3	Baxter	TN	321.9	102.74	99.0	3.74
WSEK	LIC	230C2	Burnside	KY	6.6	189.45	177.0	12.45
WKZXFM	LIC-N	228A	Lenoir City	TN	59.3	55.24	42.0	13.24
WSTR	LIC	231C	Smyrna	GA	169.7	191.45	176.0	15.45
RDEL	DEL	231C	Smyrna	GA	169.7	191.45	176.0	15.45
WFBCFM	LIC	229C	Greenville	SC	100.8	194.72	176.0	18.72
WJTT	LIC	232A	Red Bank	TN	235.3	64.77	42.0	22.77
WNFZ.A	APP-Z	232C3	Oak Ridge	TN	47.0	70.02	43.0	27.02
WNFZ	LIC	232A	Oak Ridge	TN	47.0	70.02	42.0	28.02
RADD	ADD	231C0	Smyrna	GA	169.7	191.45	163.0	28.45
WNFZ	RSV	232C3	Oak Ridge	TN	26.0	81.47	43.0	38.47
WLJAFM	LIC-N	228A	Ellijay	GA	168.0	84.13	42.0	42.13
WYU	LIC	283A	Dalton	GA	193.9	71.99	12.0	59.99
WMKK	LIC	231A	Morristown	TN	54.9	150.52	89.0	61.52
AL233	VAC	233A	Calhoun	GA	186.8	103.70	42.0	61.70
WKHT	LIC	283A	Knoxville	TN	48.4	91.50	12.0	79.50
WSGM	LIC-D	284A	Coalmont	TN	258.2	95.59	12.0	83.59
WHRP	LIC	227C1	Tullahoma	TN	253.3	159.63	76.0	83.63

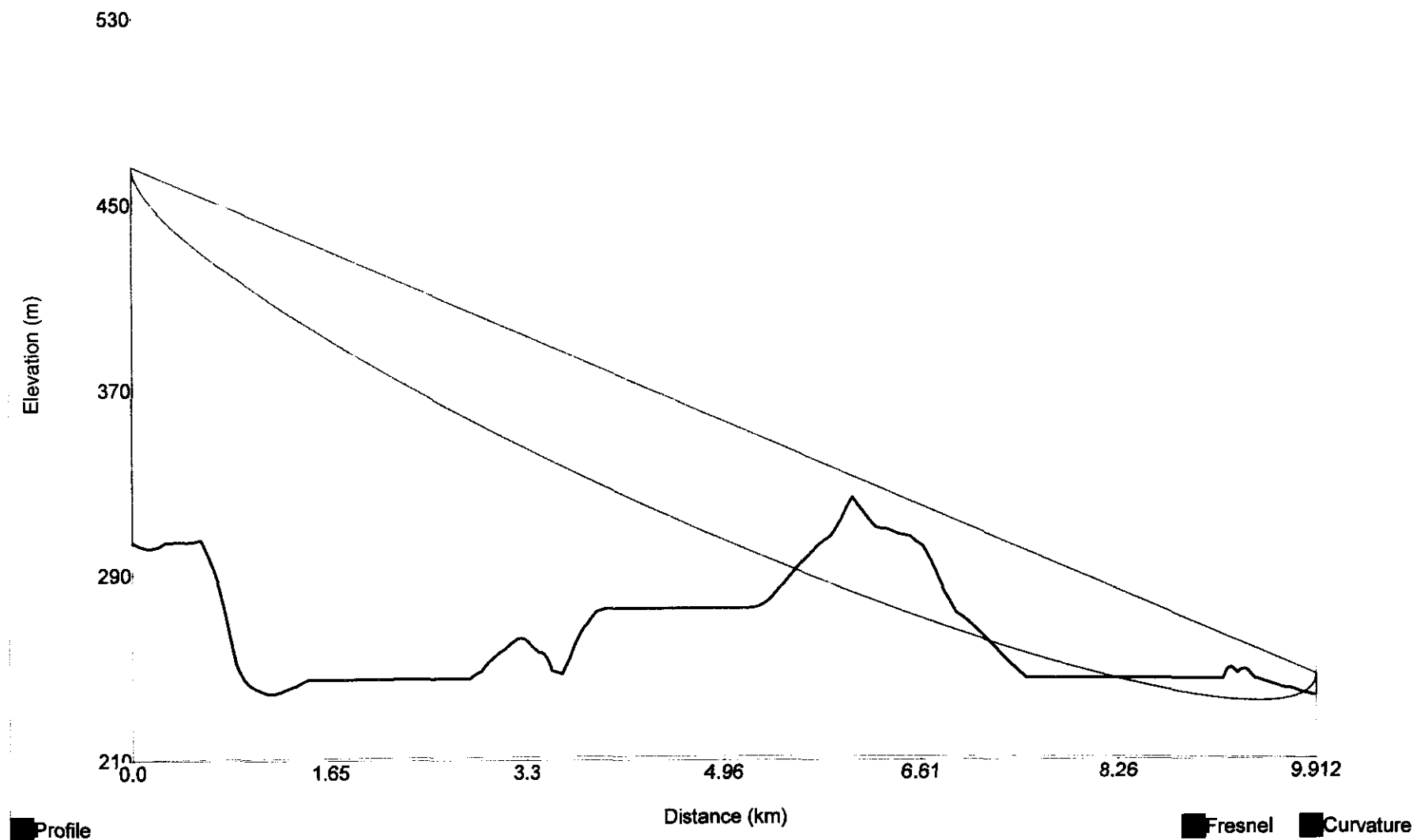
**E1B WAYA - DECATUR  
70 DBU COVERAGE**

**(C) CHARLES M. ANDERSON ASSOCIATES**



# E1C WAYA 230C3 TO DECATUR LINE OF SIGHT

Earths Curvature = 1.33



Starting Latitude: 35-27-30 N  
Starting Longitude: 084-42-18 W

End Latitude: 35-30-52 N  
End Longitude: 084-47-24 W

Distance: 9.912242453 km  
Bearing: 308.931 deg

Transmitter Height (AG) = 150.0 m  
Receiver Height (AG) = 9.1 m

Transmitter Elevation = 316.3 m  
Receiver Elevation = 237.0 m

Frequency = 93.9 MHz  
Fresnel Zone: 0.6

**E1E WAYA LOSS AREA RECEPTION SERVICES**

**WDOD-WSKZ-WDEF**

**LOSS AREA BETWEEN DOTTED CONTOURS RECEIVES 5 OR MORE FULLTIME AURAL SERVICES**

**GAIN AREA RECEIVES AT LEAST 6 FULLTIME AURAL SERVICES**

**Scale 1:800,000**

**0 10 20 30 km**

**(C) CHARLES M. ANDERSON ASSOCIATES**

**V-Soft Communications LLC**

**(C) CHARLES M. ANDERSON ASSOCIATES**

**WDOD-WSKZ-WDEF**

**LOSS AREA BETWEEN  
DOTTED CONTOURS  
RECEIVES 5 OR MORE  
FULLTIME AURAL SERVICES**

## GAIN AREA RECEIVES AT LEAST 6 FULLTIME AURAL SERVICES

Scale 1:800,000

0 10 20 30 km

V-Soft Communications LLC © ©

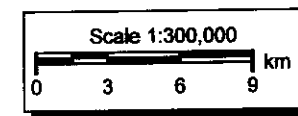
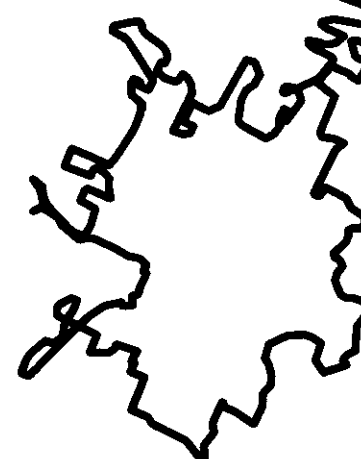
**E1F**

**WAYA  
CLEVELAND, TN  
URBANIZED AREA  
COVERAGE = 0%**

**Latitude: 35-27-30 N  
Longitude: 084-42-18 W**

 **WAYA**

**WAYA PROPOSED 230C3  
AT DECATUR, TN  
UNIFORM 70 DBU (23.2 KM)  
DOES NOT PENETRATE  
THE CLEVELAND, TN  
URBANIZED AREA**



**(C) CHARLES M. ANDERSON ASSOCIATES**

V-Soft Communications LLC ©

E2A WMPZ 228A CHANNEL STUDY  
AT PROPOSED ALLOCATION SITE

REFERENCE

35 07 06 N.  
85 14 29 W.

CLASS = A

Current Spacings

DISPLAY DATES

DATA 12-03-05

SEARCH 12-04-05

----- Channel 228 - 93.5 MHz -----

Call	Channel	Location		Azi	Dist	FCC	Margin
WMPZ	LIC-N 229A	Ringgold	GA	165.6	25.46	71.5	-46.04(1)

(1) Note mutually exclusivity with licensed facility.

WLJAFM	LIC-N 228A	Ellijay	GA	123.8	80.04	114.5	-34.46(2)
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(2) Substitution of channel 266A proposed herein.

WHRP	LIC	227C1	Tullahoma	TN	265.2	104.36	132.5	-28.14(3)
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(3) Protection not required. Reallocated to New Market, TN by final Report and Order in MB Docket No. 03-44. Note outstanding construction permit for New Market below.

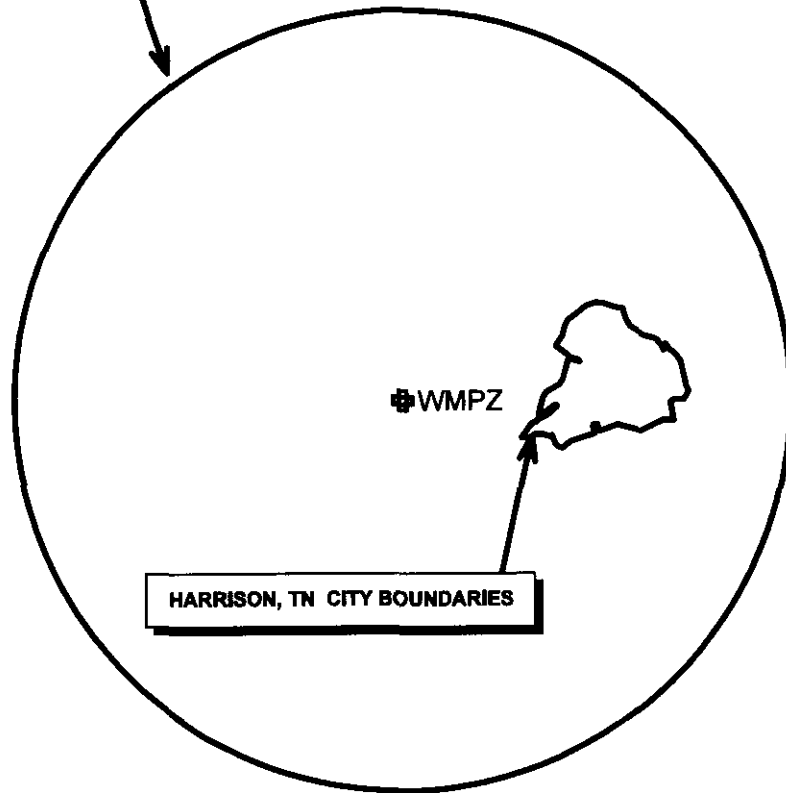
WOCE	LIC	226A	Benton	TN	94.7	31.61	30.5	1.11
WKZXFM	LIC-N	228A	Lenoir City	TN	55.3	116.70	114.5	2.20
AL227	RSV	227C2	New Market	AL	255.6	111.90	105.5	6.40
WAYA	LIC-N	230C3	Spring City	TN	45.9	66.03	41.5	24.53
WHRP.C	CP -Z	227C2	New Market	AL	254.5	131.93	105.5	26.43
WCLEFM	LIC-Z	281A	Calhoun	TN	65.6	40.10	9.5	30.60
WBXE	LIC-N	229C3	Baxter	TN	352.7	119.24	88.5	30.74
RADD	ADD	230A	Lynchburg	TN	286.5	99.17	30.5	68.67
WFBCFM	LIC	229C	Greenville	SC	89.4	240.18	164.5	75.68
RDEL	DEL	231C	Smyrna	GA	150.9	172.18	94.5	77.68
WSTR	LIC	231C	Smyrna	GA	150.9	172.18	94.5	77.68
RADD	ADD	231C0	Smyrna	GA	150.9	172.18	85.5	86.68
WDJCFM	LIC	229C0	Birmingham	AL	219.4	239.38	151.5	87.88
WVFJFM	APP-N	227C0	Manchester	GA	168.1	240.58	151.5	89.08
WVFJFM	APP-N	227C0	Manchester	GA	168.1	240.58	151.5	89.08
WVFJFM	RSV	227C0	Manchester	GA	167.9	241.42	151.5	89.92
WVFJFM	RSV	227C0	Manchester	GA	167.9	241.42	151.5	89.92
WVFJFM	RSV	227C0	Manchester	GA	167.9	241.42	151.5	89.92
AL231	RSV	231A	Gurley	AL	250.4	122.98	30.5	92.48
WZGC.C	CP -N	225C1	Atlanta	GA	150.2	167.39	74.5	92.89

**E2B WMPZ**

Latitude: 35-07-06 N  
Longitude: 085-14-29 W

Channel: 228  
Frequency: 93.5 MHz

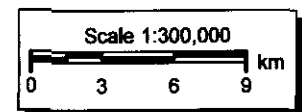
UNIFORM MAXIMUM CLASS A  
70 DBU (16.2 KM) FROM  
WMPZ 228A REFERENCE POINT



HARRISON, TN CITY BOUNDARIES

WMPZ

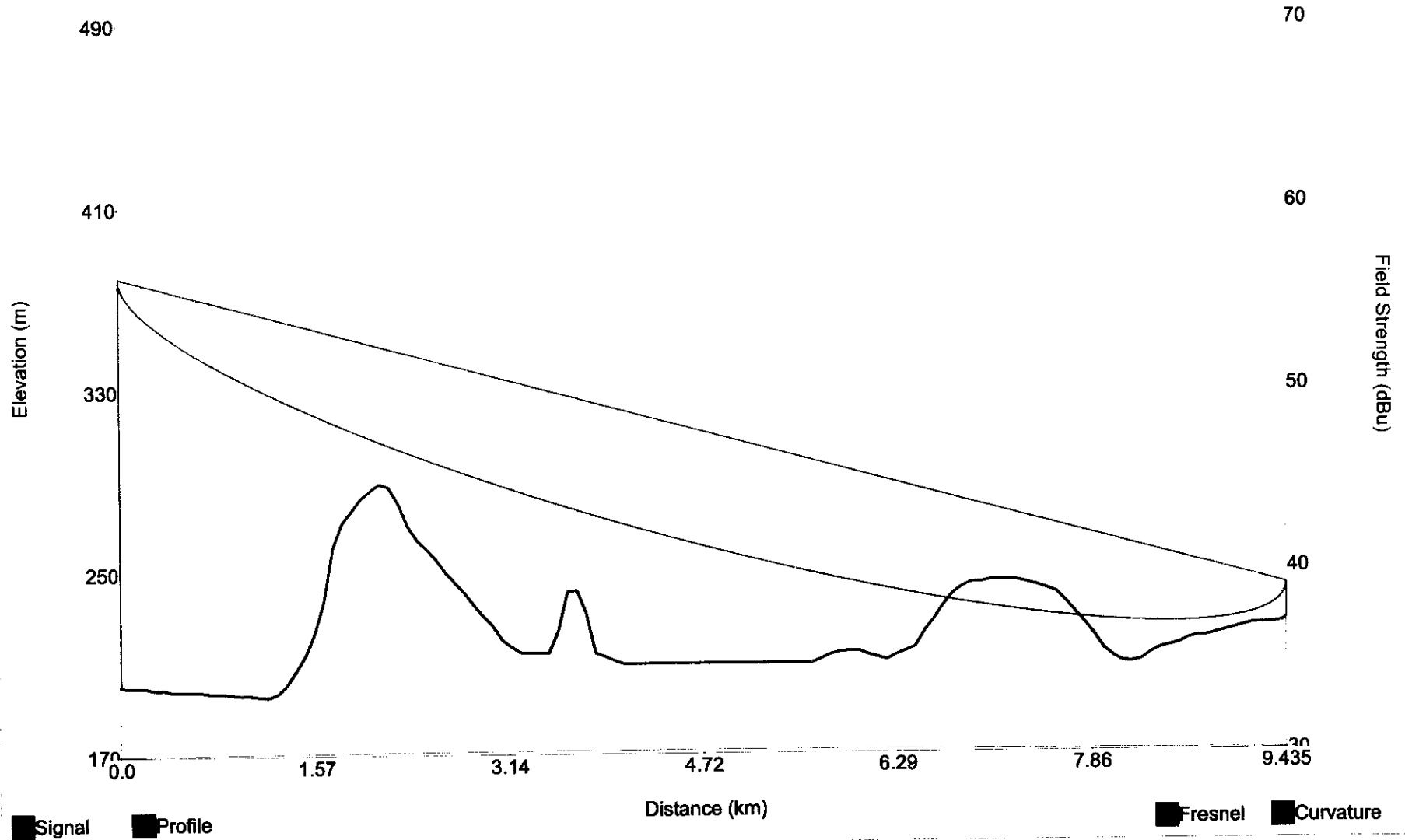
(C) CHARLES M. ANDERSON ASSOCIATES



V-Soft Communications LLC

# E2C LINE OF SIGHT TO HARRISON, TN

Earth's Curvature = 1.33



Starting Latitude: 35-07-06 N  
Starting Longitude: 085-14-29 W

End Latitude: 35-06-49 N  
End Longitude: 085-08-17 W

Distance: 9.434555775 km  
Bearing: 93.153 deg

Transmitter Height (AG) = 174 m  
Receiver Height (AG) = 9.1 m

Transmitter Elevation = 204.2 m  
Receiver Elevation = 233.3 m

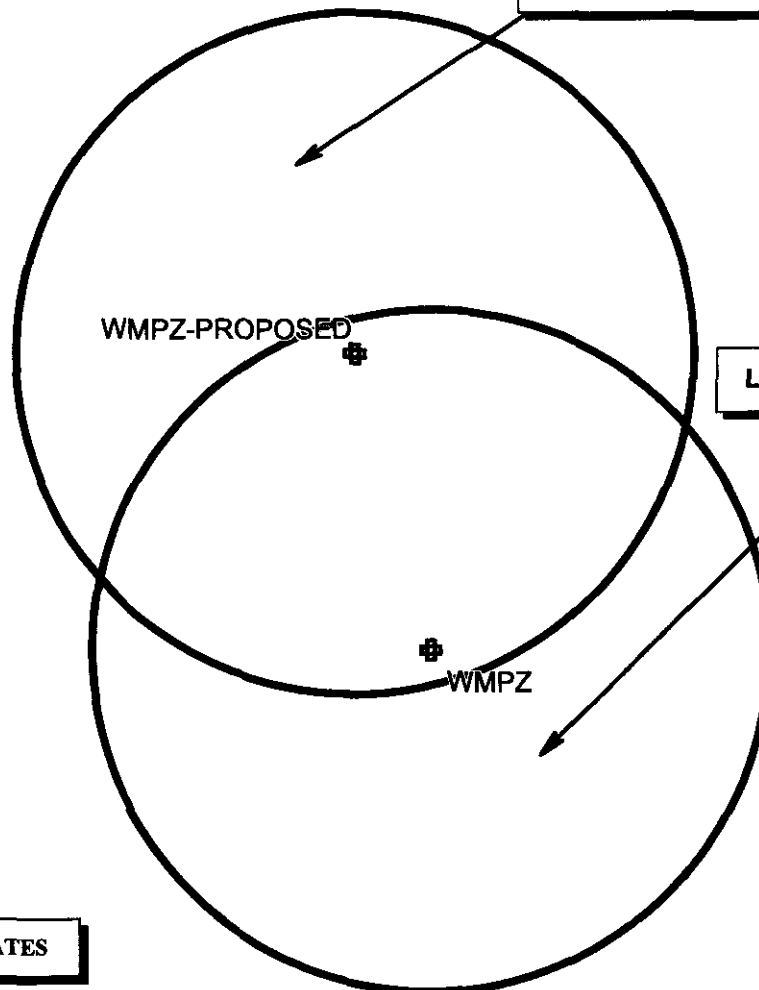
Frequency = 93.5 MHz  
Fresnel Zone: 0.6



**E2D WMPZ-PROPOSED**

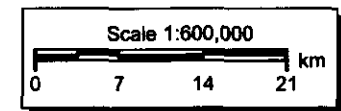
Latitude: 35-07-06 N  
Longitude: 085-14-29 W  
Channel: 228  
Frequency: 93.5 MHz

**GAIN AREA = 92,989/ 1,393.8 SQ KM  
NET LOSS = 16,257**



**LOSS AREA = 109,246/ 1,393.8 SQ KM**

**(C) CHARLES M. ANDERSON ASSOCIATES**

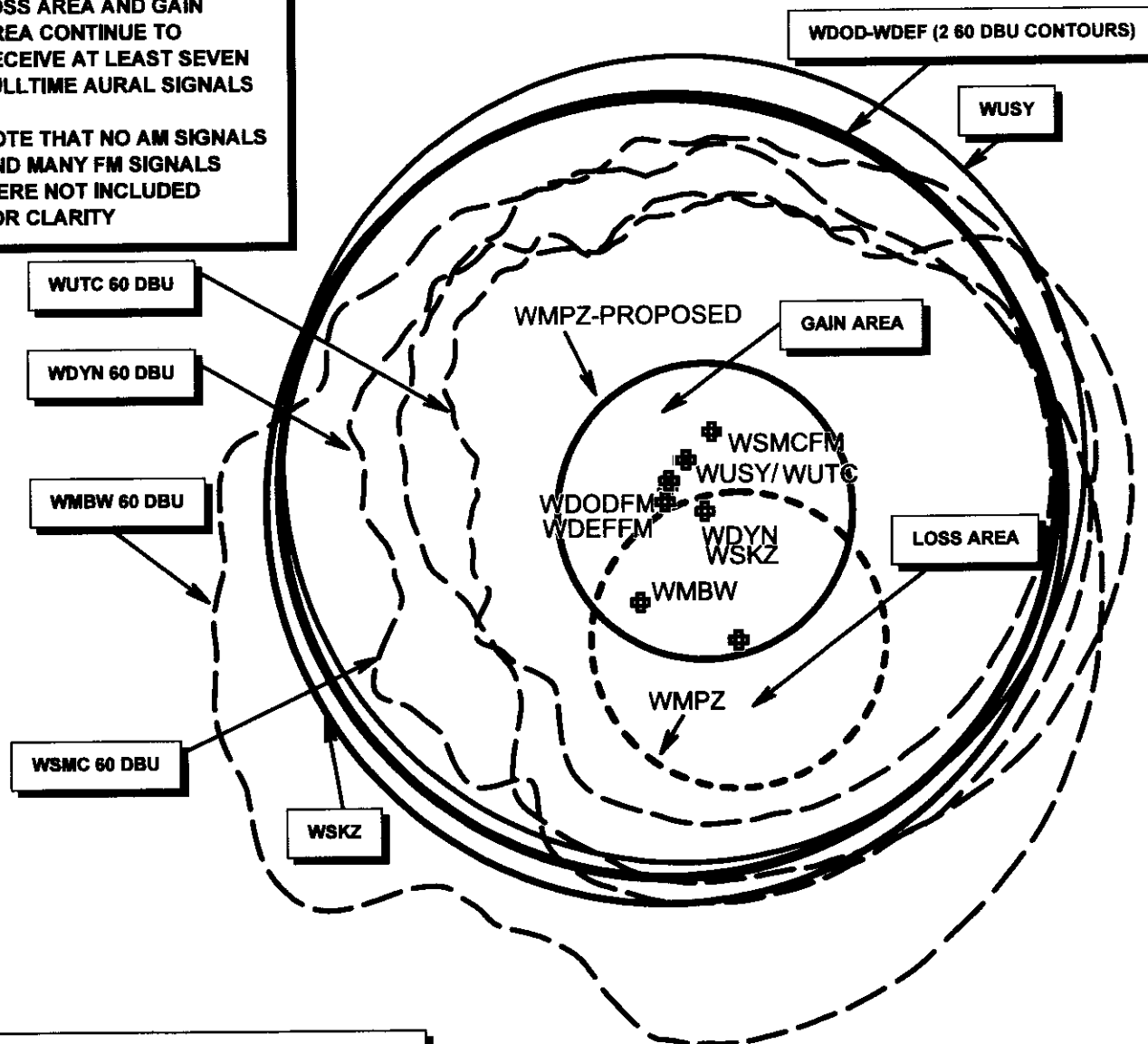


V-Soft Communications LLC ©

**E2E WMPZ-PROPOSED**

**LOSS AREA AND GAIN  
AREA CONTINUE TO  
RECEIVE AT LEAST SEVEN  
FULLTIME AURAL SIGNALS**

**NOTE THAT NO AM SIGNALS  
AND MANY FM SIGNALS  
WERE NOT INCLUDED  
FOR CLARITY**



**(C) CHARLES M. ANDERSON ASSOCIATES**

Scale 1:1,250,000  
0 10 20 30 km

V-Soft Communications LLC ©

E3 WLJA-FM ELLIJAY, GA 266A SUBSTITUTION

REFERENCE

34 42 59 N.

84 30 50 W.

CLASS = A

Current Spacings

Channel 266 - 101.1 MHz

DISPLAY DATES

DATA 12-01-05

SEARCH 12-01-05

Call	Channel	Location		Azi	Dist	FCC	Margin
WUSY	LIC 264C0	Cleveland	TN	308.0	89.10	86.0	3.10
WYDEFM	CP 266C	Cullman	AL	252.9	230.76	226.0	4.76
WYDEFM	LIC 266C	Cullman	AL	252.9	230.77	226.0	4.77
WROQ	LIC-D 266C1	Anderson	SC	91.5	205.75	200.0	5.75(1)

(1) WROQ DECLASSIFIED TO 266C1 AT EXISTING SITE PROPOSED HEREIN.

WKHXFM	LIC 268C0	Marietta	GA	170.9	102.12	86.0	16.12
WJSQ	LIC-N 269C3	Athens	TN	3.2	89.51	42.0	47.51
WWWQ.C	CP -Z 263C2	College Park	GA	173.8	106.77	55.0	51.77
WWWQ.C	CP -N 263C2	College Park	GA	179.8	113.97	55.0	58.97
WSMCFM	LIC-D 213C	Collegedale	TN	312.9	88.35	29.0	59.35
RADD	ADD 263C3	College Park	GA	179.4	106.21	42.0	64.21
WWWQ.C	CP -Z 263C3	College Park	GA	173.8	106.77	42.0	64.77
RADD	ADD 266A	Milner	GA	173.6	188.00	115.0	73.00
WSGS	LIC 266C	Hazard	KY	23.1	300.03	226.0	74.03
WECOFM	LIC-N 267C3	Wartburg	TN	356.6	163.82	89.0	74.82
WWWQ	LIC 263C	Anniston	AL	226.7	175.21	95.0	80.21
RDEL	DEL 263C	Anniston	AL	226.7	175.21	95.0	80.21
WUBT	LIC 266C1	Russellville	KY	316.3	281.25	200.0	81.25
WMXNFM	LIC 269A	Stevenson	AL	268.6	117.99	31.0	86.99
RDEL	DEL 266A	Thomaston	GA	177.5	205.68	115.0	90.68
WTGAFM	LIC-N 266A	Thomaston	GA	177.5	205.68	115.0	90.68
RADD	ADD 264C3	Social Circle	GA	152.5	153.04	42.0	111.04
RADD	ADD 264C3	Covington	GA	153.1	154.18	42.0	112.18
WSSLFM	LIC-N 263C0	Gray Court	SC	93.5	220.77	86.0	134.77
WFTZ	LIC 268A	Manchester	TN	297.5	166.81	31.0	135.81
WUTKFM	LIC 212A	Knoxville	TN	21.0	147.18	10.0	137.18
WWCU	LIC-D 213A	Cullowhee	NC	57.2	150.35	10.0	140.35
WCJMFm	LIC-N 265A	West Point	GA	195.7	214.70	72.0	142.70
WJLEFM	LIC 269A	Smithville	TN	319.0	179.18	31.0	148.18

E4A - WROQ 266C1 DECLASSIFICATION AT EXISTING SITE

REFERENCE		CLASS = C1	DISPLAY DATES
34 38 51 N.			DATA 12-01-05
82 16 13 W.	Current	Spacings	SEARCH 12-01-05
----- Channel 266 - 101.1 MHz -----			

Call	Channel	Location		Azi	Dist	FCC	Margin
WROQ	LIC-D 266C0	Anderson	SC	0.0	0.00	259.0	-259.00 (1)

(1) WROQ LICENSED FACILITY

WSSLFM	LIC-N 263C0	Gray Court	SC	120.2	16.76	94.0	-77.24 (2)
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(2) SHORTSPACING DECREASED FROM 79.24 KM TO 77.24 KM

WWDM	LIC-D 267C	Sumter	SC	114.0	160.41	209.0	-48.59 (3)
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(3) SHORTSPACING DECREASED FROM 59.59 KM TO 48.59 KM

WPZS.C	CP -Z 265A	Indian Trail	NC	68.9	150.85	133.0	17.85 (4)
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(4) 1.15 KM SHORTSPACING ELIMINATED.

WSGS	LIC	266C	Hazard	KY	344.1	294.25	270.0	24.25
WZTK	LIC-D	266C	Burlington	NC	59.9	294.59	270.0	24.59
AL265	RSV	265A	Indian Trail	NC	71.1	164.53	133.0	31.53
WTHBFM	LIC	265A	Waynesboro	GA	170.9	165.00	133.0	32.00
WTHOFM	LIC	269A	Thomson	GA	189.9	132.34	75.0	57.34
RADD	ADD	266A	Milner	GA	226.6	258.99	200.0	58.99
WLVH	LIC-Z	266C2	Hardeeville	SC	162.5	296.36	224.0	72.36
WPZS	LIC	265A	Albemarle	NC	66.2	206.11	133.0	73.11
WQUT	LIC	268C	Johnson City	TN	358.0	179.96	105.0	74.96
WTGAFM	LIC-N	266A	Thomaston	GA	225.6	280.70	200.0	80.70
RDEL	DEL	266A	Thomaston	GA	225.6	280.70	200.0	80.70
WIFMFM	LIC-N	265A	Elkin	NC	36.6	215.65	133.0	82.65
WRBK	LIC-D	212C3	Richburg	SC	86.9	114.43	24.0	90.43
WWCU	LIC-D	213A	Cullowhee	NC	319.0	117.18	22.0	95.18
WZJS.C	CP	264A	Banner Elk	NC	11.6	174.13	75.0	99.13
WZJS	LIC-D	264A	Banner Elk	NC	12.9	174.14	75.0	99.14
WPALFM	LIC	265C3	Ridgeville	SC	134.3	248.73	144.0	104.73
WPALFM	CP	265C3	Ridgeville	SC	134.3	248.73	144.0	104.73
WQIL	LIC	267C2	Chauncey	GA	197.6	263.23	158.0	105.23
WYQS	LIC	213A	Mars Hill	NC	349.1	133.09	22.0	111.09
RADD	ADD	264C3	Social Circle	GA	227.1	187.47	76.0	111.47
RADD	ADD	264C3	Covington	GA	226.9	189.16	76.0	113.16

**E4B WROQ**

BLH19870204LD  
Latitude: 34-38-51 N  
Longitude: 082-16-13 W  
ERP: 100.00 kW  
Channel: 266  
Frequency: 101.1 MHz  
AMSL Height: 540.55 m  
Elevation: 244.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

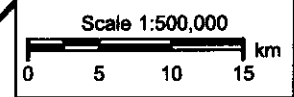
(C) CHARLES M. ANDERSON ASSOCIATES

WROQ 100 KW/299M  
TERRAIN BASED  
70 DBU CONTOUR

UNIFORM CLASS C1 70 DBU = 50 KM

WROQ

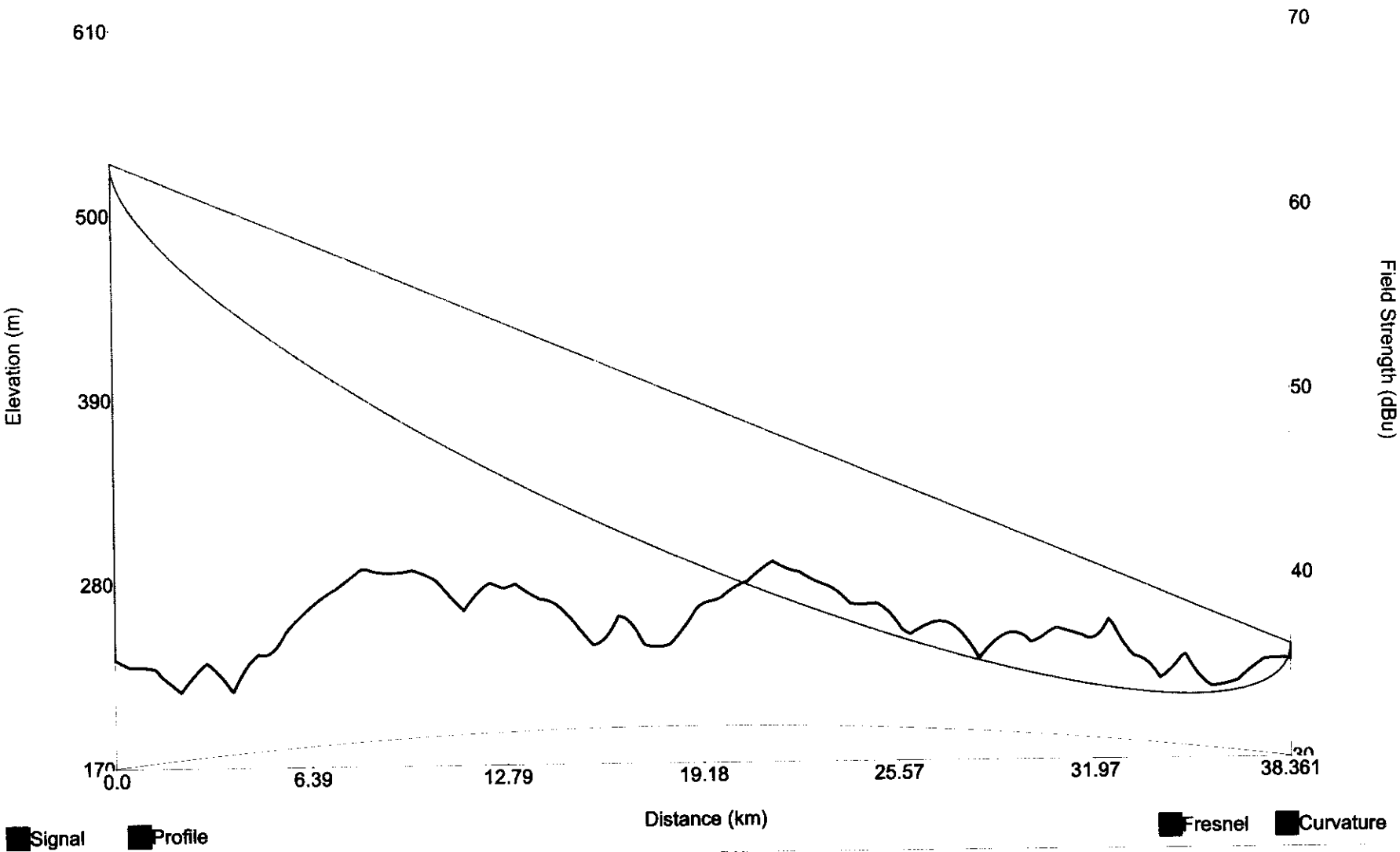
ANDERSON, SC BOUNDARIES



V-Soft Communications LLC ©

E4C WROQ - ANDERSON LINE OF SIGHT

Earths Curvature = 1.33



Starting Latitude: 34-38-51 N  
Starting Longitude: 082-16-13 W

End Latitude: 34-30-12 N  
End Longitude: 082-39-01 W

Distance: 38.360956332 km  
Bearing: 245.469 deg

Transmitter Height (AG) = 296.5 m  
Receiver Height (AG) = 9.1 m

Transmitter Elevation = 234.6 m  
Receiver Elevation = 228.0 m

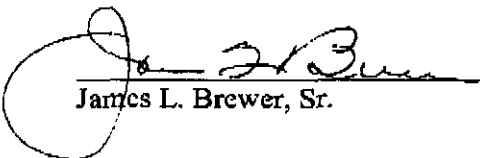
Frequency = 101.1 MHz  
Fresnel Zone: 0.6

## EXHIBIT 1

**AFFIDAVIT OF J. L. BREWER BROADCASTING OF CLEVELAND, LLC AND J. L.  
BREWER BROADCASTING, LLC**

I, James L. Brewer, Sr., the President of J. L. Brewer Broadcasting of Cleveland, LLC and J. L. Brewer Broadcasting, LLC (jointly, "**Brewer**"), hereby state that I have executed an agreement relating to the amendment of Brewer's Counterproposal in MB Docket No. 05-282. This agreement is with Woman's World Broadcasting, Inc. and calls for it to pay an amount not to exceed Brewer's legitimate and prudent expenses. Other than this Agreement, neither Brewer nor any of its principals, agents, or representatives have been paid nor promised any payment or other consideration in exchange for the amendment of Brewer's Counterproposal in MB Docket No. 05-282.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed on this 20th day of December, 2005.

  
James L. Brewer, Sr.



**AFFIDAVIT OF WOMAN'S WORLD BROADCASTING, INC.**

I, Suzanne B. Stone, the President of Woman's World Broadcasting, Inc. ("**WWB**"), hereby state that I have executed an agreement relating to the amendment of J. L. Brewer Broadcasting of Cleveland, LLC's and J. L. Brewer Broadcasting, LLC's (jointly, "**Brewer**") Counterproposal in MB Docket No. 05-282. This agreement calls for WWB to pay Brewer an amount not to exceed Brewer's legitimate and prudent expenses. I have not paid nor promised to pay any other amount of money or other consideration in exchange for the amendment that Brewer has agreed to file.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed on this \_\_\_ day of December, 2005.

  
Suzanne B. Stone

## CERTIFICATE OF SERVICE

I, Diana Gonzales in the law firm of Vinson & Elkins, do hereby certify that I have on this 20th day of December, 2005, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Counterproposal**" to the following:

\*Deborah A. Dupont  
Audio Division, Media Bureau  
Federal Communications Commission  
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Washington, DC 20554

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Diana Gonzales

\* HAND DELIVERED